

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-1744-CFC-EGT
)	
WALMART INC. AND WAL-)	
MART STORES EAST, LP,)	
)	
Defendant.)	

**STIPULATION AND [PROPOSED] ORDER AUTHORIZING
DISCLOSURE OF MISSOURI BUREAU OF NARCOTICS AND
DANGEROUS DRUGS PRESCRIBER COMPLAINT AND
INVESTIGATION FILES**

The Missouri Bureau of Narcotics and Dangerous Drugs (“MO Bureau of Narcotics and Dangerous Drugs,” and “BNDD”), a bureau within the Missouri Department of Health and Senior Services (“Department”), and Defendants Walmart Inc. and Wal-Mart Stores East, LP, (together, “Walmart”) pursuant to the Protective Order, paragraph 86, (D.I. 88) in the above-captioned action (this “Litigation”), respectfully submit this Stipulation and Proposed Order Authorizing Disclosure of Controlled Substance Registration Complaint and Investigation Files.

WHEREAS, the MO Bureau of Narcotics and Dangerous Drugs investigates and maintains files regarding the registration, investigation, and discipline of controlled substance registrants, including medical doctors who prescribe controlled substances (“Controlled Substance Registration Files”) for the state of Missouri.

WHEREAS, Walmart served a subpoena on the MO Bureau of Narcotics and Dangerous Drugs on July 17, 2025, requesting, among other information, certain Controlled Substance Registration Files.

WHEREAS, it is the MO Bureau of Narcotics and Dangerous Drugs' position that Missouri law requires an Order from this Court to permit the disclosure of the Controlled Substance Registration Files. *See* Section 195.042, RSMo.


WHEREAS, the MO Bureau of Narcotics and Dangerous Drugs and Walmart recognize that the Controlled Substance Registration Files may require specific handling and designation under the Protective Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, subject to the approval of this Court and pursuant to the Court's authority under Fed. R. Civ. P. 26(c), that:

1. The MO Bureau of Narcotics and Dangerous Drugs shall, consistent with the Protective Order, produce the Controlled Substance Registration Files for John Ure with respect to his expired BNDD Registration (12080), including (a) any materials related to the issuance, renewal, suspension, and revocation of Ure's BNDD Registration, and (b) all complaint and investigation files related to any actual and potential disciplinary action against Ure, including but not limited to (i) all written and oral communications made by any person to the MO Bureau of Narcotics and Dangerous Drugs related to any such actual or potential

disciplinary action, (ii) data, communications, and information acquired by the MO Bureau of Narcotics and Dangerous Drugs related to any such actual or potential disciplinary action, and (iii) all complaints, investigative reports, and legal opinions related to any such actual or potential disciplinary action.

2. In accordance with the Protective Order, the MO Bureau of Narcotics and Dangerous Drugs shall designate the Controlled Substance Registration Files as “Highly Confidential.”


Stephen J. Witte
Legal Counsel
Office of General Counsel
Missouri Department of Health
and Senior Services
P.O. Box 570
Jefferson City, MO 65102-0570
(573) 526-3176
Stephen.Witte@health.mo.gov

*Counsel for Missouri Bureau of
Narcotics and Dangerous Drugs*

/s/ Kelly E. Farnan
Robert W. Whetzel (#2288)
Kelly E. Farnan (#4395)
Richards, Layton & Finger, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
(302) 651-7700
whetzel@rlf.com
farnan@rlf.com

*Attorney for Defendants Walmart
Inc. and Wal-Mart Stores East, LP*

Dated: August 18, 2025

SO ORDERED this _____ day of _____, 2025.

Honorable Eleanor G. Tennyson
United States Magistrate Judge